

1 CASEY D. GISH, ESQ.
2 Nevada Bar No. 006657

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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

9 AMY VILELA, an individual;
10 JOZETTE FIGUEREDO, an individual;
11 AMY VILELA, as Special Administrator of the
12 Estate of SHALYNNE RAMOS,

13 Plaintiffs,
14 vs.

15 VALLEY HEALTH SYSTEM, LLC, d/b/a
16 CENTENNIAL HILLS HOSPITAL MEDICAL
17 CENTER, a Delaware Limited Liability
18 Company;
19 UNIVERSAL HEALTH SERVICES, INC., a
20 Delaware corporation; VALLEY HOSPITAL
21 MEDICAL CENTER, INC., a Nevada
22 Corporation; EMCARE, INC., a Delaware
Corporation; Tanya Netz PAC; Jill Mcatee, RN;
DOE Defendants I through X, inclusive; ROE
NURSES I through XX, inclusive; ZOE
HOSPITALS or OTHER MEDICAL
FACILITIES I through X; and ROE
CORPORATIONS I through X, inclusive,

23 Defendants.

Case No. 2:16-cv-01503-RFB-CWH

12 **STIPULATION AND PROPOSED**
ORDER TO EXTEND DUE DATE FOR
THE JOINT PRE-TRIAL ORDER

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- THE LAW OFFICE OF -
CASEY D. GISH

24 Plaintiffs, by and through their attorney of record, CASEY D. GISH, ESQ., of THE
25 LAW OFFICE OF CASEY D. GISH, and CRAIG D. SLATER, ESQ. of LUH &
26 ASSOCIATES; and Defendants, VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL
27 HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE, RN, by and through their
28 attorney of record CASEY TYLER, ESQ. and CHARLOTTE BUYS, ESQ., of HALL

1 PRANGLE & SCHOONVELD, LLC; and Defendants, TANYA NETZ, PAC, and EMCARE,
2 INC., by and through their attorney of record TODD WEISS, ESQ., of JOHN H. COTTON
3 AND ASSOCIATES, LTD, hereby stipulate as follows:

4 (1) As per Document No. 114 Minutes of Proceedings on Motion Hearing Held on
5 March 3, 2021 before the Honorable Richard F. Boulware, II, served on March 5,
6 2021 at 6:23 P.M. PST, “FURTHER ORDERED that parties shall submit a joint
7 pre-trial order within three weeks with proposed trial dates starting in May and June
8 2021.”

9 (2) Due to multiple objections from the defendants to Plaintiffs’ proposed Joint Pre-
10 Trial order, the parties have agreed to conduct a telephonic dispute conference on
11 March 31, 2021 at 10:00 a.m. to attempt to resolve the remaining disputes
12 pertaining to Plaintiffs’ proposed Pre-Trial Report.

13 (3) The parties have agreed that the due date to submit the Pre-Trial order should be
14 extended to April 2, 2021.

15 (4) No parties will be prejudiced by this short extension. There is no pending trial date
16 in this matter.

17 (5) This is the first request for an extension of this date.

18 IT IS SO STIPULATED.

20 DATED this 26th day of March, 2021

21 LAW OFFICE OF CASEY D. GISH

22 /s/ Casey D. Gish

23 CASEY D. GISH, ESQ.

24 Nevada Bar No. 6657

25 *Co-counsel for Plaintiffs*

26 DATED this 26th day of March, 2021

27 JOHN H. COTTON & ASSOCAITES, LTD.

28 /s/ Todd Weiss

TODD WEISS, ESQ.

Nevada Bar No. 14130

DATED this 26th day of March, 2021

LUH & ASSOCIATES

/s/ Craig D. Slater

CRAIG D. SLATER, ESQ.

Nevada Bar No. 8667

Co-counsel for Plaintiffs

DATED this 26th day of March, 2021

HALL PRANGLE & SCHOONVELD

/s/ Charlotte Buys

CHARLOTTE BUYS, ESQ.

Nevada Bar No. 14845



*Counsel for Defendant Tanya Netz, PAC and
Emcare, Inc.*

Counsel for Defendants Valley Health System, LLC d/b/a Centennial Hills Hospital Medical Center; and Jill Mcatee, RN

ORDER

Pursuant to the terms of the foregoing stipulation, the Court orders as follows:

1. Good cause exists for the extension of the due date to submit the Joint Pre-Trial Order.
2. The due date for the Joint Pre-Trial Order is extended to April 2, 2021.

IT IS SO ORDERED.

8

UNITED STATES DISTRICT JUDGE

DATED: March 29, 2021

Respectfully submitted by:

THE LAW OFFICE OF CASEY D. GISH

/s/ Casey D. Gish

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